UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Cr. No. 14-304 (PJS/TNL)

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	**DEFENDANT'S MOTION FOR**
v.	)	**DISCOVERY AND INSPECTION**
	)	
AARON QUOC KHIEU,	)	
	)	
Defendant.	)	

The defendant, Aaron Quoc Khieu, by and through his attorney, Robert D. Sicoli, respectfully moves the Court, pursuant to Fed. R. Crim. P. 16, for an Order requiring the government to disclose the following information; and/or to make the same available for inspection, copying, and photographing:

1. Any and all written or recorded statements made by the defendant or copies thereof within the possession, custody, or control of the government, the existence of which is known or by the exercise of due diligence may become known to the attorney for the government. Fed. R. Crim. P. 16(a)(1)(B)(i).

2. That portion of any written record containing the substance of any relevant oral statement made by the defendant in response to interrogation by a government agent. Fed. R. Crim. P. 16(a)(1)(B)(ii).

3. The substance of any relevant oral statement made by the defendant in response to any interrogation by any person, known to the defendant to be a government agent if the government intends to use that statement at trial. Fed. R. Crim. P. 16(a)(1)(A).

4. A copy of the prior criminal record of the defendant, if any, which is in the possession, custody, or control of the government, the existence of which is known or by the

exercise of due diligence may become known to the attorney for the government. Fed. R. Crim. P. 16(a)(1)(D).

5. Any books, papers, documents, photographs, tangible objects, buildings or places, or copies or portions thereof which are within the possession, custody, or control of the government and which are material to the preparation of the defense or are intended for use by the government as evidence in its case in chief at the trial, or were obtained from or belonged to the defendant. Fed. R. Crim. P. 16(a)(1)(E).

6. Any results or reports of physical or mental examinations, and of scientific tests or experiments, or copies thereof which are within the possession, custody, or control of the government, the existence of which is known or by the exercise of due diligence may become known to the attorney for the government, and which are material to the preparation of the defense or are intended for use by the government as evidence in its case in chief at trial. Fed. R. Crim. P. 16(a)(1)(F).

7. A pretrial written summary of testimony the government intends to use pursuant to Rules 702, 703, or 705 of the Federal Rules of Evidence during its case in chief at trial. This summary must describe the witnesses' opinions, the bases and the reasons therefore, and the witnesses' qualifications. Fed. R. Crim. P. 16(a)(1)(G).

If, prior to trial, the government discovers additional evidence or material previously requested or ordered which is subject to discovery or inspection as herein requested, the government is requested to notify the attorney for the defendant about the existence of the additional material. Fed. R. Crim. P. 16(c).

This Motion is based on the Indictment, the records and the proceedings herein, such testimony as may be presented at the motion hearing, and any briefing, which the Court may require thereafter.

Respectfully submitted,

SICOLI & GARRY, PLLC

Dated: January 7, 2015

/s Robert D. Sicoli

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